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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF IOWA**

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**In Re: MERCY HOSPITAL, IOWA CITY, IOWA, et al.**

**CHAPTER 11  
Case No. 23-00623**

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**RESPONSE TO OBJECTION TO ADMINISTRATIVE CLAIM**

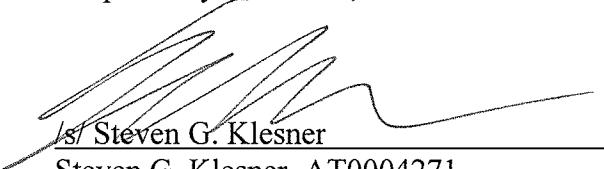
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Comes now creditor, Travel Nurse Across America, LLC (“TNAA”), by and through counsel, and for its Response to the Objection to Administrative Claim (the “Objection”) filed by Dan R. Childers, in his sole capacity as Trustee of the Mercy Hospital Liquidation Trust (“Trustee”), states as follows:

1. On March 14, 2024, TNAA filed Administrative Claim # 40055 in the amount of \$25,776.25 (the “Claim”) for services performed.
2. The Trustee filed its Objection on November 6, 2024 alleging that the Claim is not supported by the requisite documentation. The Objection requires that TNAA file any objection to the Trustee’s Objection to Claim on or before December 6, 2024.
3. Accordingly, TNAA hereby objects to the Trustee’s Objection to Claim and request that it be allowed to present the requisite supporting documentation, attached hereto as EXHIBIT A.
4. TNAA will also be filing an amended claim.

WHEREFORE, TNAA respectfully requests that the Trustee’s Objection to Claim be denied, and for all other just and proper relief to which it is entitled.

Respectfully submitted,

  
/s/ Steven G. Klesner

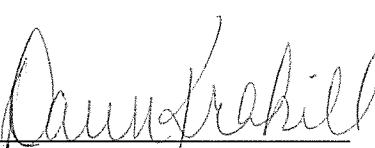
Steven G. Klesner AT0004271  
JOHNSTON, STANNARD, KLESNER,  
BURBIDGE & FITZGERALD, P.L.C.  
373 Scott Ct, Ste B, PO Box 3400  
Iowa City, IA 52244  
[steve@iclawfirm.com](mailto:steve@iclawfirm.com)  
(319)338-9852 Telephone  
(319) 354-7265 Facsimile  
ATTORNEY FOR CREDITOR  
TRAVEL NURSE ACROSS AMERICA, LLC

Dated: December 6, 2024

#### CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the date below, a true copy of the foregoing document was electronically filed in the ECF system. Notice of this filing will be sent to the parties of record by operation of the Court's electronic filing systems. Parties may access this filing through the Court's electronic system.

Dated: December 6, 2024

/s/ Dawn Krabill 

## EXHIBIT A

Invoice No	Invoice Date	Asmt No	nurses::nurseename	Hosp No	Hosp_inv::HospitalShort	creation date	GrandTotal	client_ref	acct_payroll::Wk Ending
22-817306	8/21/2023	Brid62120-9	Jennifer Bridges	HS4761	Mercy Hosp	8/21/2023	3,466.25	599058	8/12/2023
22-881504	1/26/2024	Musi229387-9	Jacqueline Musick	HS4761	Mercy Hosp	1/26/2024	4,015.00	631935	1/20/2024
22-881518	1/26/2024	Sand416473-1	Maribel Sanders	HS4761	Mercy Hosp	1/26/2024	3,400.00	631930	1/13/2024
22-881563	1/26/2024	Brid62120-11	Jennifer Bridges	HS4761	Mercy Hosp	1/26/2024	3,075.00	631933	1/20/2024
22-884705	2/5/2024	Brid62120-11	Jennifer Bridges	HS4761	Mercy Hosp	2/5/2024	3,735.00	633427	1/27/2024
22-887539	2/14/2024	Musi229387-9	Jacqueline Musick	HS4761	Mercy Hosp	2/14/2024	4,042.50	633426	1/27/2024
22-887540	2/14/2024	Musi229387-9	Jacqueline Musick	HS4761	Mercy Hosp	2/14/2024	4,042.50	634203	2/3/2024



Date: 8/21/2023

Terms: 70 days

Invoice: 22-817306

Billing Period: 8/6/2023 - 8/12/2023

Mercy Hospital  
Attn: Medefis Billing  
Medefis  
2121 N. 117th Avenue, Suite 200  
Omaha, NE 68164

Invoice for Temporary Staffing - Jennifer Bridges / RN PACU

Date	Unit	In - Out	Break	In - Out	Code	Hours	Price	Line Total
8/7/23	PACU	10:30 - 18:16	.5		Regular	7.25	\$105.00	\$761.25
8/8/23	PACU	10:30 - 19:15	.5		Regular	8.25	\$105.00	\$866.25
8/9/23	PACU	10:30 - 19:50	.5		Regular	8.75	\$105.00	\$918.75
8/10/23	PACU	10:30 - 19:00	.5		Regular	8.00	\$105.00	\$840.00
8/11/23	PACU		0		Cancel hrs	7.75		
8/11/23	PACU		0		Call	9.00	\$5.00	\$45.00
8/12/23	PACU		0		Call	7.00	\$5.00	\$35.00
<b>Subtotal</b>							<b>\$3466.25</b>	
<b>Gross Receipts/Excise Tax</b>								
<b>Hrs Total</b>				<b>56.00</b>	<b>Total</b>		<b>\$3466.25</b>	

Thank you

If you have any questions regarding this invoice,  
please contact Accounts Receivable at  
800-240-2526 or Email: [AR@tnaa.com](mailto:AR@tnaa.com)

**Send payment to:**

Travel Nurse Across America, LLC  
Dept 730068  
PO Box 660919  
Dallas, TX 75266-0919

**Tax ID: 20-1068277**

Travel Nurse Across America, LLC  
5020 Northshore Dr., Suite 2  
North Little Rock, AR 72118  
TEL: 800-240-2526  
FAX: 501-663-2886

Overnight Deliveries should be addressed to:

Travel Nurse Across America, LLC  
Fifth Third Wholesale Lockbox  
Dept 730068  
2701 E. Grauwylter Rd.  
Irving, TX 75061

Medefis HS4761 No Mail, Medefis



Date: 1/26/2024

Terms: 70 days

Invoice: **22-881518**

Billing Period: 1/7/2024 - 1/13/2024

Mercy Hospital  
Attn: Medefis Billing  
Medefis  
2121 N. 117th Avenue, Suite 200  
Omaha, NE 68164

Invoice for Temporary Staffing - **Maribel Sanders / RN Endo**

Date	Unit	In - Out	Break	In - Out	Code	Hours	Price	Line Total
1/8/24	Endo	7:15 - 16:30	.5		Regular	8.75	\$100.00	\$875.00
1/9/24	Endo	6:15 - 16:30	.5		Regular	9.75	\$100.00	\$975.00
1/10/24	Endo	11:11 - 16:22	0		Regular	5.00	\$100.00	\$500.00
1/11/24	Endo	5:56 - 16:53	.5		Regular	10.50	\$100.00	\$1050.00
<b>Subtotal</b>							<b>\$3400.00</b>	
<b>Gross Receipts/Excise Tax</b>								
<b>Hrs Total</b>				<b>34.00</b>	<b>Total</b>		<b>\$3400.00</b>	

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Date: 1/26/2024

Terms: 70 days

Invoice: 22-881563

Billing Period: 1/14/2024 - 1/20/2024

Mercy Hospital  
Attn: Medefis Billing  
Medefis  
2121 N. 117th Avenue, Suite 200  
Omaha, NE 68164

Invoice for Temporary Staffing - **Jennifer Bridges / RN PACU**

Date	Unit	In - Out	Break	In - Out	Code	Hours	Price	Line Total
1/16/24	PACU	10:30 - 12:00	0	12:30 - 17:30	Regular	6.50	\$100.00	\$650.00
1/17/24	PACU	10:30 - 13:00	0	13:30 - 19:00	Regular	8.00	\$100.00	\$800.00
1/18/24	PACU	10:30 - 13:00	0	13:30 - 18:30	Regular	7.50	\$100.00	\$750.00
1/19/24	PACU	10:30 - 13:15	0	13:45 - 19:00	Regular	8.00	\$100.00	\$800.00
1/19/24	PACU	19:01 - 19:50	0		Call Back	0.75	\$100.00	\$75.00
<b>Subtotal</b>								<b>\$3075.00</b>
<b>Gross Receipts/Excise Tax</b>								
<b>Hrs Total</b>				<b>30.75</b>	<b>Total</b>		<b>\$3075.00</b>	

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FAX: 501-663-2886

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2701 E. Grauwyler Rd.  
Irving, TX 75061

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Date: 1/26/2024

Terms: 70 days

Invoice: 22-881504

Billing Period: 1/14/2024 - 1/20/2024

Mercy Hospital  
Attn: Camie Marshek  
HR

Invoice for Temporary Staffing - Jacqueline Musick / RN LD

Date	Unit	In - Out	Break	In - Out	Code	Hours	Price	Line Total
1/16/24	LD	18:52 - 7:28	.5		Regular	12.25	\$110.00	\$1347.50
1/17/24	LD	18:52 - 7:26	.5		Regular	12.25	\$110.00	\$1347.50
1/18/24	LD	18:53 - 7:34	.5		Regular	12.00	\$110.00	\$1320.00
<b>Subtotal</b>								<b>\$4015.00</b>
<b>Gross Receipts/Excise Tax</b>								
<b>Hrs Total</b>								<b>\$4015.00</b>
<b>Total</b>								<b>\$4015.00</b>

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Tax ID: 20-1068277

Tax ID: 45-1033217  
Travel Nurse Across America, LLC  
5020 Northshore Dr., Suite 2  
North Little Rock, AR 72118  
TEL: 800-240-2526  
FAX: 501-663-2886

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Fifth Third Wholesale Lockbox  
Dept 730068  
2701 E. Grauwyler Rd.  
Irving, TX 75061

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Date: 2/5/2024

Terms: 70 days

Invoice: 22-884705

Billing Period: 1/21/2024 - 1/27/2024

Mercy Hospital  
Attn: Medefis Billing  
Medefis  
2121 N. 117th Avenue, Suite 200  
Omaha, NE 68164

Invoice for Temporary Staffing - **Jennifer Bridges / RN PACU**

Date	Unit	In - Out	Break	In - Out	Code	Hours	Price	Line Total
1/22/24	PACU	10:30 - 14:10	0	14:40 - 19:11	Regular	8.25	\$100.00	\$825.00
1/23/24	PACU	10:30 - 13:00	0	13:30 - 19:13	Regular	8.25	\$100.00	\$825.00
1/24/24	PACU	10:30 - 15:00	0	15:30 - 18:12	Regular	7.25	\$100.00	\$725.00
1/26/24	PACU	10:30 - 13:00	0	13:30 - 18:30	Regular	7.50	\$100.00	\$750.00
1/26/24	PACU	18:30 - 20:30	0		Call	2.00	\$5.00	\$10.00
1/26/24	PACU	20:31 - 1:00	0		Call Back	4.50	\$100.00	\$450.00
1/27/24	PACU	1:01 - 23:59	0	0:00 - 7:00	Call	30.00	\$5.00	\$150.00
<b>Subtotal</b>							<b>\$3735.00</b>	
<b>Gross Receipts/Excise Tax</b>								
<b>Hrs Total</b>							<b>67.75</b>	<b>Total</b>
<b>\$3735.00</b>								

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Medefis HS4761 No Mail, Medefis



Date: 2/14/2024

Terms: 70 days

Invoice: 22-887539

Billing Period: 1/21/2024 - 1/27/2024

Mercy Hospital  
Attn: Camie Marshek  
HR

Invoice for Temporary Staffing - Jacqueline Musick / RN LD

Date	Unit	In - Out	Break	In - Out	Code	Hours	Price	Line Total
1/22/24	LD	18:52 - 7:38	.5		Regular	12.50	\$110.00	\$1375.00
1/23/24	LD	18:54 - 7:32	.5		Regular	12.00	\$110.00	\$1320.00
1/24/24	LD	18:54 - 7:40	.5		Regular	12.25	\$110.00	\$1347.50
<b>Subtotal</b>								<b>\$4042.50</b>
<b>Gross Receipts/Excise Tax</b>								
<b>Hrs Total</b>				<b>36.75</b>	<b>Total</b>		<b>\$4042.50</b>	

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Date: 2/14/2024

Terms: 70 days

Invoice: 22-887540

Billing Period: 1/28/2024 - 2/3/2024

Mercy Hospital  
Attn: Camie Marshek  
HR

Invoice for Temporary Staffing - Jacqueline Musick / RN LD

Date	Unit	In - Out	Break	In - Out	Code	Hours	Price	Line Total
2/1/24	LD	18:53 - 7:59	.5		Regular	12.50	\$110.00	\$1375.00
2/2/24	LD	18:53 - 7:52	.5		Regular	12.25	\$110.00	\$1347.50
2/3/24	LD	18:54 - 7:31	.5		Regular	12.00	\$110.00	\$1320.00
<b>Subtotal</b>								<b>\$4042.50</b>
<b>Gross Receipts/Excise Tax</b>								
<b>Hrs Total</b>								<b>36.75</b>
<b>Total</b>								<b>\$4042.50</b>

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FAX: 501-663-2886

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Irving, TX 75061

Medefis HS4761 No Mail, Medefis